



DEPARTMENT OF THE ARMY  
U.S. ARMY ARMAMENT RESEARCH, DEVELOPMENT AND ENGINEERING CENTER  
PICATINNY ARSENAL, NEW JERSEY 07806-5000



REPLY TO  
ATTENTION OF  
SMCAR-SEA (200-1a)

11 SEP 1992

MEMORANDUM FOR Commander, U.S. Army Armament, Munitions and  
Chemical Command, ATTN: AMSMC-ISE-M  
(CPT Bill Metcalf), Rock Island, IL  
61299-6000

SUBJECT: Response to Report of Environmental Compliance Review  
at U.S. Armament, Research and Development Center, 6-10 April 92

1. As requested enclosed is the current status of correcting and resolving the deficiencies noted in the above referenced inspection.
2. Any questions please contact the undersigned at DSN: 880-5818 or commercial 201-724-5818.

Encl  
as

*Thomas J. Solecki*  
THOMAS J. SOLECKI  
Chief, Environmental Affairs  
Division

797

325

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ANNEX B  
ENVIRONMENTAL COMPLIANCE REVIEW RECOMMENDATIONS REPORT  
(SR/A = STATUTORY-REGULATORY OR ADMINISTRATIVE)

<u>ITEM NO</u>	<u>MEDIA</u>	<u>OBSERV/ RECOM NO</u>	<u>SR/A</u>	<u>FACILITY NAME/ NUMBER</u>	<u>COMMENTS</u>
01	ENV MGT	1b1d	SR		Reason: 95% COMPLETE, EDC 30 NOV 92
02	AIR	2b1d	SR	Building 3801	Reason: COMPLETED, always in compliance (had extended fill pipe already but drawings incorrect).
03	AIR	2b2d1	SR		Reason: 52% COMPLETE. Survey in progress. EDC 9/94.
04	AIR	2b2d2	SR		Reason: INCOMPLETE BUT UNDER DEVELOPMENT. AMC established; overview completed including detailed outline, establishment of milestones, and compilation of all pertinent SOPs. ESSENTIALLY EDC 6/93, BUT FINAL DETAILS ARE DEPENDENT ON SURVEY COMPLETION IN 9/94.
05	AIR	2b2d3	SR		Reason: COMPLETED. Contractor performing survey always had training at appropriate level. Personnel developing AMP took training upon establishment of AMC in June 92. COMPLETED IN JUNE 92.

125

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06	AIR	2b3d	SR		Reason: COMPLETED. Memorandum for Record always existed from date of the call. DATE OF CALL 4/21/91.
07	AIR	2b4d	SR		Reason: COMPLETED. Training for supervisors, etc. of asbestos workers is ongoing with appropriate level obtained last in May 92. COMPLETED MAY 92.
08	WW	3b1d	SR		Reason: COMPLETED. Permit always allowed minor flows of non-contact cooling water into sewerage system. Permit was misread prior to audit. ALWAYS WAS COMPLETED.
09	SPILLS	4b1d1	SR		Reason: Picatinny has met with the local State Emergency Response Commission to strike a mutual aid agreement. The agreement is currently being drafted. EDC Unknown.

206

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10	SPILLS	4bld2	SR		Reason: The SPCCP and ISCP are currently revised and will include the EPCRA information. EDC Unknown.
11	HAZ WST	5bld1	SR	Building 24	Reason: The seven (7) 20-yard roll-off containers from the building 24 tank closures were disposed of at RCRA permitted TSD. The containers were shipped during the period of 5 May 92 to 19 May 92. Completed.
12	HAZ WST	5bld2	SR	Building 95	Reason: The twenty-five (25) 20-yard roll-off containers from the building 95 tank closures were disposed of at a RCRA permitted TSD. The containers were shipped during the period of 4 May 92 to 18 May 92. COMPLETED

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13	HAZ WST	5b2d	SR	Building 31, bay 2	Reason: The five (5) rusty containers in bay 2 of building 31 were identified via discussions with personnel from building 31. Three of the drums were empty and had once held hydraulic oil. The other two drums had held the same and had filled with rainwater. All the containers were disposed of. COMPLETED.
14	HAZ WST	5b3d1	SR	Building 519	Reason: Preliminary information indicates at least 1 tank is regulated by RCRA.
15	HAZ WST	5b3d2	SR	Building 519	Reason: Recommended by Chief, Environmental Affairs Division, overridden by Chief, Safety, Surety and Environmental Office, proceed after preliminary determinations are made. EDC Unknown.
16	HAZ WST	5b3d3	SR	Building 519	Reason: FY 93 if DERA fund obtained. EDC Unknown.

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17	HAZ WST	5b4d	SR	Building 311	Reason: The building 311 gasoline UST is now being measured to the nearest one-eighth inch. COMPLETE.
18	SOL WST	6b1d1	SR	Health Clinic	Reason: COMPLETE
19	SOL WST	6b1d2	SR	Dental Health Facility	Reason: COMPLETE
20	SOL WST	6b1d3	A	Dental Health Facility	Reason: COMPLETE
21	TSCA	7b1d	SR	Building 3114	Reason: The proper PCB regulatory markings have been attached to building 3114.

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22	TSCA	7b2d	SR		Reason: The proper markings for the transformers have been ordered. EDC NOV 92.
23	PESTS	8b1d	SR		Reason: INCOMPLETE. Completion of draft of IMPM expected by Sep 30 92. Submittal for approval at AMC expected by 11/30/92. EDC 11/30/92.
24	PESTS	8b2d	SR		Reason: COMPLETED. All contracts for pest operations now submitted for review and approval. COMPLETED 5/92.
25	PESTS	8b3d1	SR		Reason: COMPLETED. All applications and issuances of pest are reported to IPMPC. COMPLETED 5/92.

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26	PESTS	8b3d2	SR		Reason: COMPLETED. DD Form 1532 now submitted as required. COMPLETED 5/92.
27	PESTS	8b4d1	SR	Golf Course	Reason: Inventories are kept current and provided to individuals. COMPLETED 6/92.
28	PESTS	8b4d2	SR	Golf Course	Reason: COMPLETED. Pests procured by golf course are being approved by AMC in writing. EDC 3/93 for next growing season.
29	PESTS	8b4d3	SR	Golf Course	Reason: COMPLETED. Disposal of registered herbicides. Completed 4/8/92.
30	PESTS	8b4d4	SR	Golf Course	Reason: COMPLETED. Affixed label to herb container of P.M.A.S. COMPLETED 4/8/92.
31	PESTS	8b4d5	SR	Golf Course	Reason: INCOMPLETE. Standard procedures including checklist being developed and implemented by Dec 92. Note: has been self-monitoring in past, since applicators are licensed. PROJECTED COMPLETION DATE 12/92.



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32	WATER	9b1d	SR		Reason: Water committee formed. PROJECTED DATE OF PROGRAM PLAN COMPLETION IS DEC 92. START OF IMPLEMENTATION OF PLAN DURING FY 93.
33	WATER	9b2d	SR		Reason: INCOMPLETE. Start marking and coding in accordance with cross connection PROGRAM PLAN BEING DEVELOPED BY DEC 92.
34	WATER	9b3d	SR		Reason: INCOMPLETE. SOP is being drafted. Expect draft completion by Dec 92. FINALIZED BY FEB 93.
35	NOISE	10b1d2	SR		Reason: ICUZ, being programed for FY 93.
36	NOISE	10b1d2	SR		Reason: ICUZ, being programed for